

**Exhibit E**

**Estimated Staffing and Budget Plan**

**STAFFING PLAN FOR SULLIVAN & CROMWELL LLP, COUNSEL TO THE  
DEBTORS AND DEBTORS-IN-POSSESSION,  
FOR THE PERIOD NOVEMBER 1, 2023 THROUGH JANUARY 31, 2024**

| TIMEKEEPER<br>CATEGORY                     | NUMBER OF<br>TIMEKEEPERS<br>EXPECTED TO WORK ON<br>THE MATTER DURING<br>THE APPLICATION<br>PERIOD <sup>(1)</sup> | RANGE OF RATES <sup>(1)</sup> |
|--|--|-------------------------------|
| Partners                                   | 25   | \$1,595.00 – \$2,375.00       |
| Special Counsel, Of<br>Counsel, Associates | 75   | \$775.00 – \$2,375.00         |
| Non-Legal Personnel                        | 40   | \$195.00 – \$650.00           |

(1) Estimate is for total number of timekeepers billing any substantial number of hours to matter (not F.T.E.s).

(2) Includes clerks, legal analysts and eDiscovery professionals.

(3) Reflects rate increases due to matriculation or promotion during the interim fee period.

**ESTIMATED BUDGET FOR SULLIVAN & CROMWELL, COUNSEL  
TO THE DEBTORS AND DEBTORS-IN-POSSESSION,  
FOR THE PERIOD NOVEMBER 1, 2023 THROUGH JANUARY 31, 2024**

| PROJECT CATEGORY                                       | ESTIMATED<br>HOURS <sup>1</sup> | ESTIMATED<br>FEES <sup>2</sup> | HOURS<br>BILLED | FEES SOUGHT    |
|--|---------------------------------|--------------------------------|-----------------|----------------|
| ASSET ANALYSIS AND<br>RECOVERY                         | 1,500.00                        | \$1,787,500.00                 | 1,055.90        | \$1,606,197.50 |
| ASSET DISPOSITION                                      | 11,000.00                       | \$13,255,000.00                | 3,673.90        | \$5,024,068.00 |
| ASSUMPTION AND<br>REJECTION OF LEASES<br>AND CONTRACTS | 150.00                          | \$178,750.00                   | 4.30            | \$6,137.00     |
| AVOIDANCE ACTION<br>ANALYSIS                           | 5,400.00                        | \$6,435,000.00                 | 6,049.30        | \$7,790,318.50 |
| BUSINESS OPERATIONS                                    | 900.00                          | \$1,072,500.00                 | 259.30          | \$376,896.00   |
| CASE ADMINISTRATION                                    | 600.00                          | \$715,000.00                   | 78.30           | \$160,101.00   |
| CLAIMS ADMINISTRATION<br>AND OBJECTIONS                | 1,500.00                        | \$1,776,500.00                 | 812.40          | \$999,117.50   |
| CORPORATE<br>GOVERNANCE AND<br>BOARD MATTERS           | 600.00                          | \$715,000.00                   | 111.40          | \$177,078.00   |
| EMPLOYEE BENEFITS AND<br>PENSIONS                      | 375.00                          | \$446,875.00                   | 117.90          | \$158,986.50   |

<sup>1</sup> Estimated hours represent high-end of S&C's estimates of hours during the interim fee period.

<sup>2</sup> Estimated fees represent high-end of S&C's estimates of fees during the interim fee period.

| PROJECT CATEGORY                           | ESTIMATED HOURS <sup>1</sup> | ESTIMATED FEES <sup>2</sup> | HOURS BILLED     | FEES SOUGHT            |
|--|------------------------------|-----------------------------|------------------|------------------------|
| EMPLOYMENT AND FEE APPLICATIONS (S&C)      | 300.00                       | \$357,500.00                | 256.50           | \$304,508.00           |
| EMPLOYMENT AND FEE APPLICATIONS (OTHERS)   | 225.00                       | \$268,125.00                | 81.60            | \$112,380.50           |
| FINANCING AND CASH COLLATERAL              | 60.00                        | \$71,500.00                 | -                | \$0.00                 |
| OTHER LITIGATION                           | 900.00                       | \$1,072,500.00              | 589.60           | \$926,486.50           |
| MEETINGS AND COMMUNICATIONS WITH CREDITORS | 600.00                       | \$715,000.00                | 67.10            | \$136,347.00           |
| NON-WORKING TRAVEL                         | 150.00                       | \$178,750.00                | 49.00            | \$46,872.40            |
| PLAN AND DISCLOSURE STATEMENT              | 12,500.00                    | \$14,932,500.00             | 2,067.40         | \$2,839,250.00         |
| RELIEF FROM STAY AND ADEQUATE PROTECTION   | 120.00                       | \$143,000.00                | 53.20            | \$78,272.50            |
| TAX  | 2,250.00                     | \$2,681,250.00              | 1,836.90         | \$2,940,133.50         |
| VALUATION                                  | 0.00                         | \$0.00                      | -                | \$0.00                 |
| DISCOVERY                                  | 7,500.00                     | \$8,937,500.00              | 4,159.60         | \$2,932,308.00         |
| HEARINGS                                   | 250.00                       | \$299,750.00                | 63.70            | \$117,675.50           |
| FIRST AND SECOND DAY MOTIONS               | 0.00                         | \$0.00                      | 28.40            | \$59,679.00            |
| CLAIMS INVESTIGATION                       | 3,000.00                     | \$3,575,000.00              | 17.70            | \$13,717.50            |
| GENERAL INVESTIGATION                      | 1,500.00                     | \$1,787,500.00              | 598.80           | \$876,257.50           |
| SCHEMES, SOFAS AND REPORTING               | 45.00                        | \$53,625.00                 | 12.20            | \$22,224.00            |
| OTHER MOTIONS/APPLICATIONS                 | 2,250.00                     | \$2,681,250.00              | 604.60           | \$871,706.50           |
| TIME ENTRY REVIEW                          | 1,800.00                     | \$759,000.00                | 822.50           | \$0.00                 |
| BUDGETING                                  | 30.00                        | \$35,750.00                 | 1.00             | \$530.00               |
| GENERAL REGULATORY                         | 300.00                       | \$357,500.00                | 78.80            | \$120,787.50           |
| BAHAMAS MATTERS                            | 1,800.00                     | \$2,145,000.00              | 649.10           | \$848,390.00           |
| FOREIGN DEBTOR MATTERS                     | 2,250.00                     | \$2,681,250.00              | 637.80           | \$1,129,500.50         |
| COORDINATION WITH FOREIGN PROCEDURES       | 450.00                       | \$536,250.00                | 34.80            | \$75,702.00            |
| COORDINATION IN OTHER BANKRUPTCIES         | 1,950.00                     | \$2,323,750.00              | 242.30           | \$274,352.50           |
| INVESTIGATIVE REPORTS                      | 600.00                       | \$715,000.00                | 3.00             | \$4,104.50             |
| CYBER ISSUES                               | 1,050.00                     | \$1,251,250.00              | 355.50           | \$554,019.50           |
| <b>Total</b>                               | <b>63,905.00</b>             | <b>\$74,941,625.00</b>      | <b>25,473.80</b> | <b>\$31,584,104.90</b> |